REMARKS

Applicants have amended claims 5, 16 and 26. Support for the amendments to the claims is found in the above-identified application at page 9, lines 16-17, page 10, lines 3-21, page 11, lines 1-11, and page 14, lines 13-16. Accordingly, no new matter has been entered by way of these amendments. In view of the above amendments and the following remarks, Applicants hereby request further examination and reconsideration of the application, and allowance of claims 5-35.

Applicants thank the Office for its courtesy in participating in a telephonic interview with the undersigned on May 9, 2003 to discuss Applicants' amendments and remarks submitted on April 21, 2003 with regard to distinguishing claims 5, 16 and 26 from U.S. Patent No. 6,301,462 to Freeman et al. ("Freeman") and the other art of record. In particular, the Office and the undersigned discussed the limitation of "a device management system that provides low-level commands to the electronic training devices ... to implement functions that change a configuration of the electronic training devices," as recited in claim 5, and "providing low-level commands to the electronic training devices ... to implement functions that change a configuration of the electronic training devices," as recited in claims 16 and 26, as discussed in the amendment of April 21, 2003. The Office suggested further refining these limitations in claims 5, 16 and 26 to further distinguish the claims from Freeman and the other art of record to show what a "change in configuration of the electronic training devices" result in. In response, Applicants have amended claims 5, 16 and 26 as shown herein and submit the following remarks.

In addition to the limitations recited in claims 5, 16 and 26 which are not disclosed nor suggested by Freeman as discussed in the amendment of April 21, 2003, neither Freeman nor the art of record suggests or discloses, "the changed configuration results in manipulating fundamental operations of the electronic training devices ..." as discussed further herein below. Applicants respectfully direct the Office's attention to Freeman at col. 5, lines 42-62 and FIG. 2, which discloses clients 201-207 accessing servers 204 and 231-244 to obtain course content, resources and services, such as e-mail, chat sessions, conferences, accounting, admissions and login, during a teaching process 300. But, the clients 201-207 are not actually changing the configurations of the servers 204 and 231-244 to the extent that the "fundamental operations" of the servers 204 and 231-244 themselves are being manipulated

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or altered. For instance, client 201 cannot cause the e-mail server 241 to interface with the client 205 to implement a wide area network.
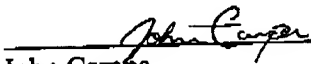
In contrast, embodiments of the present invention enable users to alter fundamental operations of the electronic training devices during training exercises, as disclosed at page 10, lines 3-21 through page 11, line 11 in the above-identified application. Further, the present invention can change the configuration of the user devices 314 depending on the user's actions during a training exercise whereas other systems, such as Freeman, simply have clients that interact with servers only in the manner the servers are programmed to behave. For example, and referring to page 11, lines 5-11 in the above-identified application, a Frame Relay switch may be used to implement a wide area network connection between user devices. Another example is provided at page 14, lines 13-16 in the above-identified application, where the user devices may comprise mechanical shuttles that can move a beaker to different locations, for example, during a training exercise, such as a chemistry lab. Referring now to page 9, lines 16-17 in the above-identified application, allowing devices to be controlled for assignments enables embodiments of the invention to replicate real-world scenarios that other systems, such as Freeman, simply cannot. As such, claims 5, 16 and 26 are patentable over Freeman for these additional reasons.

In accordance with 37 C.F.R. § 1.121, attached hereto is a marked-up copy of the changes made to the claims by the current amendment. The version with markings to show changes made is located in the attached Appendix A.

In view of all of the foregoing, it is submitted that this case is in condition for allowance and such allowance is earnestly solicited. In the event that there are any outstanding matters remaining in the above-identified application, the Office is invited to contact the undersigned to discuss this application.

Respectfully submitted,

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John Campa
Registration No. 49,014

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Serial Number: 09/540,401

NIXON PEABODY LLP
Clinton Square, P.O. Box 31051
Rochester, New York 14603
Telephone: (585) 263-1519
Facsimile: (585) 263-1600

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APPENDIX A

Version With Markings to Show Changes Made

In reference to the amendments made herein to the claims 5, 16 and 26, additions appear as underlined text while deletions appear as bracketed text, as indicated below:

In The Claims:

Claims 5, 16 and 26 have been amended as follows:

5.   (Twice Amended) A system for [managing] utilizing a plurality of electronic training devices to perform training, the system comprising:

a client communication system that receives control data from at least one of a plurality of clients, the control data associated with tasks to be performed by the electronic training devices for a training exercise;

a device management system that provides low-level commands [to] for the electronic training devices based on the control data from the at least one client to implement functions that change a configuration of the electronic training devices, wherein the changed configuration results in manipulating fundamental operations of the electronic training devices that the training electronic training devices are originally configured to perform; and

a control system that accesses a first set of the electronic training devices based upon one or more requirements of the training exercise, the control system manipulating the first set of the electronic training devices according to the control data using the low-level commands provided by the device management system to perform portions of the training exercise.

16.   (Twice Amended) A method for [managing] utilizing a plurality of electronic training devices to perform training, the method comprising:

receiving control data from at least one of a plurality of clients, the control data associated with tasks to be performed by the electronic training devices for a training exercise;

providing low-level commands [to] for the electronic training devices based on the control data from the at least one client to implement functions that change a configuration of the electronic training devices, wherein the changed configuration results in

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manipulating fundamental operations of the electronic training devices that the electronic training devices are originally configured to perform;

accessing a first set of the electronic training devices based upon one or more requirements of the training exercise; and

manipulating the first set of the electronic training devices according to the control data using the low-level commands [provided to the electronic training devices] to perform portions of the training exercise.

26.   (Twice Amended) A computer-readable medium having stored thereon instructions for [managing] utilizing a plurality of electronic training devices to perform training, which when executed by one or more processors causes the processors to perform:

receiving control data from at least one of a plurality of clients, the control data associated with tasks to be performed by the electronic training devices for a training exercise;

providing low-level commands [to] for the electronic training devices based on the control data from at least one client to implement functions that change a configuration of the electronic training devices, wherein the changed configuration results in manipulating fundamental operations of the electronic training devices that the electronic training devices are originally configured to perform;

accessing a first set of the electronic training devices based upon one or more requirements of the training exercise; and

manipulating the first set of the electronic training devices according to the control data using the low-level commands [provided to the electronic training devices] to perform portions of the training exercise.

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